## SEC COMMENTS COLLECTION

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## **COMMENTERWORDS**

The current plan for the Northern Pass Project calls for construction of 500 miles of access roads to the Northern Pass power line and widening the present right-of-way itself to allow for High Voltage lines.

My concern with the Northern Pass application is the absence of reliable data on the project's carbon footprint. The Hydro-Quebec website states,

"Almost all the electricity Hydro-Quebec distributes to its customers is generated from renewable resources, which means there are few or no greenhouse gases (GHG) emissions. The CO2 emission rates are for generation of electricity only and are thus not based on a life-cycle assessment."

These are preposterous statements, given that HQ created 571 dams to form their reservoirs. To do so, HQ destroyed trees, natural habitat, native cultures, fishing industry, wildlife, and tourism industry. Only two of Quebec's main rivers are now free of dams.

GHG emissions generated by creating reservoirs used to produce electricity are not considered when calculating emissions or Hydro-Quebec's carbon footprint:

"As indicated in the National Inventory report, GHG sources and sinks in Canada, Environment Canada considers such emissions to be related to a land-use change."

The SEC would be wise to check out this ruling. Hydro-Quebec has a history of shady deals, i.e. locking Newfoundland into a 40-year plan to sell them power for two mils/ kWh, which HQ then sells to Quebec customers for 7 cents/kWh.

Re: The Northern Pass plan to build 500 miles of access roads to the proposed High Voltage power lines. Holes for 35' deep pilings will need to be dug/blasted and the pilings formed with cement. (1 ton of cement emits 1 ton of CO2.) A cost estimate of offsetting that carbon footprint would need to include blasting expenses, cement, cement mixer trucks and other vehicles used in the building process, plus trucks needed as preparation for routine maintenance of the line following ice, snow, wind and electrical storms.

Hydro-Quebec does not appear to be in the habit of rigorously measuring and offsetting its carbon footprint. What plans are in place to replace the carbon footprint caused by the above extensive tree removal and piling construction? Northern Pass would need to add this provision and cost to their bottom line to impose the above ground line on the State of NH.

Undergrounding the line through NH's established right-of-way would not only avoid much of this cost, it would recognize our resolve to save our carbon sequestering trees for the benefit of all life on the planet. Maine and New Hampshire lead the nation in forested land. We need to care for these remaining lungs of the earth.

If the line is not undergrounded, Northern Pass needs to offset its more extensive carbon footprint. The Carbon Disclosure Project (CDP) is a global, not-for-profit based in London that provides the formula to increase corporate transparency of its impact and performance. The CDP logs the records of 4000+ companies worldwide.

Hydro Quebec has already demonstrated its disregard for the forest by ravishing its own province. Quebec's damage has been well documented. I hope that the SEC will take care to see that NH does not suffer a similar onslaught to our forest by sanctioning such an ecologically tragic plan for NH.